

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

CLIFTON TERRELL CANNON

INDICTMENT

Case No. _____

Violation: 21 U.S.C. §§ 841(a)(1),
841(b)(1)(C), and 846; and 18 U.S.C.
§ 2

COUNT ONE

**Conspiracy to Possess with Intent to Distribute and Distribute a Controlled Substance
Resulting in Serious Bodily Injury**

The Grand Jury Charges:

From on or between May 1, 2017, and the date of this Indictment, in the District of
North Dakota, and elsewhere,

CLIFTON TERRELL CANNON

did knowingly and intentionally combine, conspire, confederate, and agree with others,
both known and unknown to the grand jury, to possess with intent to distribute and
distribute a mixture and substance containing a detectable amount of heroin, a Schedule I
controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and
841(b)(1)(C), and Title 18, United States Code, Section 2.

Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects of it, one
or more of the conspirators committed the following overt acts:

1. It was a part of said conspiracy that the defendant and others did possess with intent to distribute and distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within the state of North Dakota, and elsewhere;

2. It was further a part of said conspiracy that the defendant and others would and did attempt to conceal their activities;

3. It was further a part of said conspiracy that the defendant and others would and did use telecommunication facilities;

4. It was further a part of said conspiracy that the defendant and others would and did use United States currency in their drug transactions; and

5. The distribution of a mixture and substance containing a detectable amount of heroin in Fargo, North Dakota, on or about June 17, 2017, resulted in serious bodily injury to J.P.;

In violation of Title 21, United States Code, Section 846; Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT TWO

Distribution of a Controlled Substance Resulting in Serious Bodily Injury

The Grand Jury Further Charges:

On or about June 17, 2017, in the District of North Dakota,

CLIFTON TERRELL CANNON

did knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, resulting in serious bodily injury to J.P.;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT THREE

Distribution of a Controlled Substance

The Grand Jury Further Charges:

On or about June 17, 2017, in the District of North Dakota,

CLIFTON TERRELL CANNON

did knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

A TRUE BILL:

/s/ Grand Jury Foreperson
Foreperson

/s/ Christopher C. Myers
CHRISTOPHER C. MYERS
United States Attorney

JTR:ld